

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:	*	Case 11-7996(EAG)
	*	Chapter 11
CARTONERA QUEBRADILLANA INC	*	
Reorganized Debtor	*	

MOTION FOR SALE PURSUANT TO REORGANIZATION PLAN

TO THE HONORABLE COURT:

COMES NOW, THE REORGANIZED DEBTOR (herein referred as 'Debtor'), by and through its legal counsel, and respectfully states and prays

PROCEDURAL BACKGROUND

1. On April 12, 2013 Debtor in Possession's Amended Plan of Reorganization was approved by this Honorable Court.
2. The plan as confirmed states as source of funding the plan the sale of debtor's equipment and fixtures
3. The debtor has received a proposal for the acquisition of equipment listed as follows for the agreed price of \$150,000.00.(SEE Exhibit A)
4. Debtor intends to sell the equipment aforementioned free and clear of any liens to Papelera Puertorriqueña de Utuado for the agreed price of \$150,000.00. Debtor understands that this offer is in the best interest of the Estate.

5. Any party objecting to the propose sale must file a written objection stating the reasons for the objection with the clerk of the court within twenty one(21) days from the filing of the present notice of sale.

6. If no objections or counter offers are timely filed, the sale will be authorized by the bankruptcy court and will be consummated in accordance with the terms of the offer to purchase without further notice or hearing. If any objection or counteroffers are timely filed, the bankruptcy court will schedule a hearing to consider such objections and or counteroffers.

NOTICE

Within Twenty One **(21) days** after service as evidenced by the certification, and an additional three days (3) pursuant to Fed. R Bank P 9006(f) **if you were served by mail**, any party against whom this motion has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this motion with the Clerk's office of the US Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the motion will be deemed unopposed and may be granted unless(i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise

WHEREFORE, the Reorganized Debtor respectfully requests that this Court that present MOTION FOR SALE be entertained by this Honorable Court and that after notice and hearing if require the sale be approved such other and further relief that this Court deems necessary, just and proper.

RESPECTFULLY SUBMITTED

In San Juan, PR this 8th^t day of May 2013

I HEREBY CERTIFY that on this same date I electronically filed the foregoing with the Clerk of the Bankruptcy Court using CM/ECF system which will send notification to the following; US trustee's office .and any other party which has requested notice.

S/ Andres J Garcia-Arregui
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Papelera Puertorriqueña, Inc.

7 de mayo de 2013

Sr. José Candelaria
Cartonera Quebradillana
HC 5 BOX 50017
Camuy, PR 00627

Estimada Sr. Candelaria:

Estamos muy agradecidos con usted por tomarnos en cuenta al momento de realizar la venta de sus equipos.

Luego de evaluar su propuesta y ver las unidades en funcionamiento, tenemos la intención de adquirir todos los equipos presentados. Según dialogado, nuestra empresa pagará un monto total de \$150,000.00 divididos en tres plazos.

Quedamos en espera de su contestación al respecto para comenzar los trámites necesarios con el fin de iniciar la transacción.

Siempre a su disposición,

José Juan Ríos Ortiz
Presidente